



UNITED STATES MARINE CORPS
TRAINING COMMAND
2042 SOUTH STREET
QUANTICO, VIRGINIA 22134-5001

5213
C47
18 Oct 2002

COMMANDER'S POLICY LETTER 7-02

From: Commander, Training Command
To: Distribution List

Subj: FINANCIAL DISCLOSURE REQUIREMENTS

1. Situation. Establish financial disclosure requirements for members of Training Command.

2: Mission.

a. Who:

Commanding Officer, The Basic School
Commanding Officer, Weapons Training Battalion
Commanding Officer, School of Infantry (West)
Commanding Officer, School of Infantry (East)
Commanding Officer, Marine Corps Combat Service Support School

Executive Officer, The Basic School
Executive Officer, Weapons Training Battalion
Executive Officer, School of Infantry (West)
Executive Officer, School of Infantry (East)
Executive Officer, Marine Corps Combat Service Support School

Commanding Officers, Commanders and Officers In Charge, Detachment Commanders and Marine Representatives of Training Command that meet reporting requirements established by the Joint Ethics Regulation and/or when determined to be required by Commander, Training Command. This includes Executive Officers.

b. What: The Joint Ethics Regulation, DoD 5500.7-R requires certain members, military and civilian, to annually file the Office of Government Ethics Confidential Financial Disclosure Report (OGE Form 450).

c. When: The OGE Form 450 should be completed, signed and forwarded on or after 30 September on an annual basis, since they encompass a Fiscal Year that begins on 1 October.

d. Where: Forward completed forms to this command no later than the 15th working day of October on an annual basis.

e. Why: To ensure compliance with the Joint Ethics Regulation (JER).

Subj: FINANCIAL DISCLOSURE REQUIREMENTS

EXTRACT FROM THE JOINT ETHICS REGULATION

SECTION 3. CONFIDENTIAL FINANCIAL DISCLOSURE REPORT (SF 450)

7-300. Individuals Required to File

a. Covered Positions. For purposes of this section, unless required to file an SF 278, Appendix C of this Regulation, or unless expressly exempted, the following individuals are in "covered positions" and are required by 5 C.F.R. 2634 (reference (a)) in subsection 7-100 of this Regulation, above, to file initial and annual SF 450 [now called an OGE 450], Appendix C of this Regulation, through their supervisor to their Ethics Counselor as set out in subsection 7-305 of this Regulation, below:

(1) **Commanding Officers, heads and deputy heads, and Executive Officers of:**

(a) **Navy shore installations with 500 or more military and civilian DoD employees (including foreign nationals and indirect-hire personnel regularly attached but excluding personnel attached for temporary duty); and**

(b) **All Army, Air Force, and Marine Corps installations, bases, air stations or activities.**

NOTE: Commander, Training Command, may always require subordinates to file in those instances where the circumstances recommend it (for loose example, if the CO, Marine Detachment, Lackland AFB, handled a large independent acquisition account because of new military police trainees' requirement for black gear, then Training Command might have an interest in knowing if the Commanding Officer owns significant stock in the company from which he buys).

With this in mind, the JER provides that "covered positions" also include:

(3) DoD employees classified at GS/GM-15 or below under 5 U.S.C. 5332 (reference (c)) or a comparable pay level under other authority, and **members of the military below the grade of O-7 as follows:**

(a) **When the official responsibilities of such DoD employees require them to participate personally and substantially through decision or exercise of significant judgment in taking an official action for contracting or procurement, administering or monitoring grants, subsidies, licenses or other Federally conferred financial or operational benefits, regulating or auditing any non-Federal entity, or other activities in which the final decision or action may have a direct and substantial economic impact on the interests of any non-Federal entity;**

(b) **Any DoD employees serving in a position in which his supervisor determines that the duties and responsibilities of the position require the DoD employee to file such a report to avoid an actual or apparent conflict of interest and to carry out the purpose of any**

Subj: FINANCIAL DISCLOSURE REQUIREMENTS

statute, Executive Order, or regulation applicable to or administered by that reporting individual.

Again, absent special circumstances, the vast majority of Commanding Officers and Executive Officers should not be required to file.

3. Execution.

a. Commander's Intent: Minimize reporting requirements.

b. Concept of Operations: The Joint Ethics Regulation may be found at http://www.defenselink.mil/dodgc/defense_ethics/ethics_regulation/. The OGE Form 450 may be downloaded from <http://www.usoge.gov/home.html>.

c. Tasks: Complete OGE Form 450 on an annual basis as directed above. Commander, Training Command is responsible for reviewing and signing the Commanding Officer's submission and forwarding it to the "Agency's Final Reviewing Official", Counsel, MCCDC/MCB Quantico, VA. The Commanding Officer is responsible for reviewing and signing the Executive Officer's submission and shall forward it for review by the Commander, who will subsequently forward it to the Counsel MCCDC/MCB Quantico, VA.

d. Coordinating Instructions: Counsel, MCCDC/MCB Quantico is available to answer ethics questions and may be reached at Commercial 703-784-3009 or DSN 278-3009.

4. Administration and Logistics. None.

5. Command and Signal.

a. Key Personnel:

Staff Secretary, Commercial 703-784-0028, DSN 278-0028 or the Adjutant/Legal Officer, Commercial 703-784-5042, DSN 278-5042.

6. Applicability. This policy letter is applicable to all commands and units of Training Command.


GEORGE J. FLYNN

DISTRIBUTION: B

Lee Maj Jeffrey D

From:
To:

Ball 1stLt Bradley J
Monday, November 04, 2002 1:52 PM
Capt Aaron Tooke (E-mail); Capt Aisha Bakkar-Poe (E-mail); Capt Alyce Furnebok (E-mail);
Capt Brian Dow (E-mail); Capt Charlton Evans (E-mail); Capt Christopher Silvern (E-mail);
Capt Douglas Finn (E-mail); Capt Jesse Constante (E-mail); Capt Joseph Delaney (E-mail);
Capt Noah Kornick (E-mail); Capt William Rudd (E-mail); Col Bernard O'Neil (E-mail); Col
Richard West (E-mail); Col Thomas Kelly (E-mail); Col William Meade (E-mail); CWO3 Abel
Galaviz (E-mail); CWO4 Robert Grimes (E-mail); CWO5 Katherine Creswell (E-mail); GySgt
Graham Cocksedge (E-mail); GySgt Leon Michiline (E-mail); GySgt Timothy Reddix (E-mail);
LtCol Chris Nielsen (E-mail); LtCol Don Walter (E-mail); LtCol Douglas Keeler (E-mail); LtCol
Edward Dunlap (E-mail); LtCol Kathleen Harrison (E-mail); LtCol Mark Singleton (E-mail);
LtCol Ray Maddox (E-mail); LtCol Robert Rea (E-mail); LtCol Robert Rice (E-mail); LtCol
Thomas Hamilton (E-mail); Maj Dan Mielke (E-mail); Maj Daniel Peterlick (E-mail); Maj Dave
Reynolds (E-mail); Maj David Areola (E-mail); Maj George Cadwalader (E-mail); Maj Jaime
Collazo (E-mail); Maj Michael Aloise (E-mail); Maj Stephen Dubois (E-mail); Maj Thomas
Johnson (E-mail); MSgt Ronald Wetherbee (E-mail); SSgt Robert Sears (E-mail); CAPT Brad
Bennett (E-mail); CAPT Carl Hooton (E-mail); Col Gordon Bourgeois (E-mail); Col John
Terrell (E-mail); Col Jonathan Pasco (E-mail); Col Lance McBride (E-mail); Col Melvin Spiese
(E-mail); Col Richard Smith (E-mail); Col Roy Byrd (E-mail); Col William Smith (E-mail); LtCol
Christopher Houser (E-mail); Garibay CWO2 Julian A; Hernandez CWO2 Jesus Jr; Jenkins
CWO3 Frederick

Cc:
Subject:

Lee Maj Jeffrey D
FW: FINANCIAL DISCLOSURE REQUIREMENTS

Importance:

High



OGE 450 Policy
Ltr.doc

Ladies and Gentlemen:

The attached policy is provided for appropriate action. It requires specific actions by the following individuals:

Commanding Officer, The Basic School
Commanding Officer, Weapons Training Battalion
Commanding Officer, School of Infantry (West)
Commanding Officer, School of Infantry (East)
Commanding Officer, Marine Corps Combat Service Support School

Executive Officer, The Basic School
Executive Officer, Weapons Training Battalion
Executive Officer, School of Infantry (West)
Executive Officer, School of Infantry (East)
Executive Officer, Marine Corps Combat Service Support School

The determination regarding applicability was made after recommendations by the TECOM G-1 and MCCDC
ansel. It was based on staffing goals of 500 or more, as explained in the policy letter.

This policy will be permanent and establishes an annual cycle for submission of OGE Form 450's to the CG,

Training Command.

For initial implementation, MCCDC Counsel recommends completion and submission before the end of Nov 02. Accordingly, request the above individuals complete and submit their OGE 450s to this office at this headquarters no later than COB, Friday, 22 Nov 02. The OGE Form 450 may be downloaded from <http://www.usoge.gov/home.html>.

For Commanding Officers, the CG Training Command signs the "Immediate Reviewer" block. For Executive Officers, your respective Commanding Officer should sign the "Immediate Reviewer" block. Regardless of individual submitting the OGE Form 450, MCCDC Counsel is the "Agency Final Reviewing Official" for all Training Command. [NOTE: All Marine General Officers are required to submit Public Financial Disclosure Report (SF 278), in lieu of the OGE. The Office of the Counsel to CMC ensures proper compliance for CMC]

For all other Commanding Officers and Detachment Commanders: No action is required, unless your organizational status changes and you are staffed with permanent personnel at a level that exceeds 500 or more. Legal opinion supports the exclusion of student populations.

For all Commanding Officers: Additionally, should a Commanding Officer not listed in this policy or a member of any command become significantly involved in the acquisition process and meet the definition of a "covered position" individual, as addressed in this policy, please ensure compliance with the reporting requirements.

MCCDC Counsel is available to answer ethics questions and may be reached at Commercial 703-784-3009 or DSN 278-3009.

Questions regarding this policy should be addressed to the Staff Secretary, Training Command.

Staff Lieutenant Bradley J. Ball
Adjutant, Training Command
Comm (703) 784-5042
DSN 278-5042